1	DAVID L. ANDERSON (CABN 149604) United States Attorney		
2 3	HALLIE HOFFMAN (CABN 210020) Chief, Criminal Division		
4	SCOTT D. JOINER (CABN 223313) Assistant United States Attorney		
5	450 Golden Gate Avenue, Box 36055		
6	San Francisco, California 94102-3495 Telephone: (415) 436-7200 FAX: (415) 436-7234 scott.joiner@usdoj.gov		
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8	Attorneys for United States of America		
9	UNITED STATES DISTRICT COURT		
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11	NORTHERN DISTRICT OF CALIFORNIA		
12	SAN FRANCISCO DIVISION		
13	UNITED STATES OF AMERICA,	) No. CR 16-00116 EMC	
14	Plaintiff,	) STIPULATION TO EXCLUDE TIME FROM ) EEDBLIARY 27, 2010 THROUGH HINE 12, 2010.	
15	v.	) FEBRUARY 27, 2019 THROUGH JUNE 12, 2019; [PROPOSED] ORDER	
16	NEMR HALLAK,		
17	TOLGA SUATAC, MICHELINA PERNA,	) )	
18	a/k/a Michelle Perna, a/k/a Michelle Perry,	) )	
19	a/k/a Sonia Perry, and ROBERTO MANCINI,		
20	,	) )	
21	Defendants.		
22		-'	
23	It is stipulated by and between counsel for the United States and counsel for defendant Roberto		
24			
	Mancini, that time be excluded under the Speedy Trial Act from February 27, 2019 through June 12,		
25	2019.	2- 2010 1	
26	At the status conference held on February 27, 2019, the government and counsel for the		
27	defendant agreed that time be excluded under the Speedy Trial Act in light of the complexity of the case,		
28	which the government represented involves thousands of victims and tens of thousands of pages of		
	STIPULATION TO EXCLUDE TIME; [PROPOSED] ORDER No. CR 16-00116 EMC		

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1	1 documents, and for effective preparation of counsel	. For these reasons and as further stated on the	
2	record at the status conference, the parties stipulate and agree that excluding time until June 12, 2019		
3	will allow for the effective preparation of counsel. See 18 U.S.C. § 3161(h)(7)(B)(ii), (B)(iv). The		
4	parties further stipulate and agree that the ends of justice served by excluding the time from February 27,		
5	2019, through and including June 12, 2019, from computation under the Speedy Trial Act outweigh the		
6	best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(ii),		
7	7 (B)(iv).		
8	8 The undersigned Assistant United States Att	torney certifies that he has obtained approval from	
9	counsel for the defendant to file this stipulation and proposed order.		
10	10 IT IS SO STIPULATED.		
11			
12	12 DATED: April 25, 2019	/ <sub>S</sub> / SCOTT D. JOINER	
13	13	Assistant United States Attorney	
14	14		
15	15 DATED: April 25, 2019	/s/ MARTÍN SABELLI	
16	16	Counsel for Defendant Roberto Mancini	
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## **PROPOSED** ORDER

Based upon the facts set forth in the stipulation of the parties and the representations made to the Court on February 27, 2019, and for good cause shown, the Court finds that failing to exclude the time from February 27, 2019, through June 12, 2019, would unreasonably deny defense counsel and the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence, and is also appropriate in light of the complexity of the case, which the government represented involves thousands victims and tens of thousands of pages of documents. 18 U.S.C. § 3161(h)(7)(B)(ii), (iv). The Court further finds that the ends of justice served by excluding the time from February 27, 2019, through and including June 12, 2019 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time from February 27, 2019, through and including June 12, 2019 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(ii), (B)(iv).

IT IS SO ORDERED.

DATED: April 25, 2019

HON. EDWARD M. CHEN United States District Judge